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MEMO ENDORSED

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July 2, 2014

BY ECF

Hon. Kimba M. Wood
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: United States v. Ryan, et al.,
12 Cr. 384 (KMW)

Dear Judge Wood:

I, along with John Kaley, represent the defendant Stephen Bycholski, in the above-referenced matter. I am writing to request that the conditions of Mr. Bycholski's bail be modified to permit him to travel to Rhode Island to work on a family home and help care for his niece and nephew this summer. The Honorable Ronald L. Ellis granted a similar request on August 2, 2012. I have discussed this application with AUSA Micah Smith and Pretrial Services Officers Jeff Steimel and Jennifer Amato.¹ Both the Government and Pretrial Services consent to this bail modification request.

*Granted.
 KMW*

I respectfully request a modification of Mr. Bycholski's bail conditions to permit him to travel to Rhode Island for the above purposes from July 3, 2014 to September 30, 2014.² Mr. Bycholski's family plans to spend most of their summer at a family home in Rhode Island. The home is located at 25 Terrace Avenue, Westerly, Rhode Island 02891, just outside of Connecticut. They have asked Mr. Bycholski to do maintenance work and other home improvements, as well as take care of his niece and nephew, while his sister and brother-in-law work during the day. His travel will likely be day trips only as he

¹ Mr. Bycholski resides in Connecticut and is directly supervised by Connecticut Pretrial Services Officer Jennifer Amato. Ms. Amato informed me that Mr. Bycholski reports weekly and is in full compliance with the conditions of his release. New York Pretrial Services Officer, Jeff Steimel, participates in the supervision of Mr. Bycholski since the indictment is pending in the Southern District of New York

² Mr. Bycholski was released on bail following his arrest on March 21, 2012. His current bail conditions are as follows: \$50,000 personal recognizance bond, co-signed by one financially responsible person, no associations with any co-defendants, known victims or witnesses; pre-approval from Pretrial Services prior to returning any merchandise valued at \$250 or more; and, regular Pretrial Services supervision and compliance with all conditions of Pretrial Services. Mr. Bycholski's travel is also restricted to the Southern District of New York, Eastern District of New York and the District of Connecticut. Additionally, Mr. Bycholski surrendered his passport and agreed to make no new passport applications.

works nights. However, he would like to have the flexibility to stay overnight, if his employment schedule allows.

By way of background, on July 1, 2013, pursuant to a plea agreement, Mr. Bycholski entered a plea of guilty to Counts One, Two and Three of the indictment. Sentencing was scheduled for December 17, 2013. On December 17, 2013, Your Honor noted the significant rehabilitation efforts Mr. Bycholski had made, specifically, completion of drug and alcohol treatment and achievement of sobriety, stable and regular employment, and restoration of family relationships. After expressing the desire to provide Mr. Bycholski with an opportunity to build a longer track record of productive living, Your Honor adjourned sentencing to December 11, 2014.

Since December 17, 2013, and for several months before, Mr. Bycholski has been compliant with all the conditions and requirements of Pretrial Services. He has maintained his sobriety and been drug-free, continued to be employed and worked to further cultivate and restore his relationships with his family. Mr. Bycholski continues to live a productive and law-abiding life.

Accordingly, I respectfully request that the Court modify the conditions of Mr. Bycholski's release to allow him to travel to Rhode Island from July 3, 2014 to September 30, 2014.

Thank you for your consideration of this request.

Respectfully yours,

/s/

Anthony Cecutti

cc: AUSA Micah Smith (via e-mail)
Pretrial Services Officer Jeff Steimel (via e-mail)
Pretrial Services Officer Jennifer Amato (via email)

7-2-14
SO ORDERED, N.Y., N.Y.
Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.